

**UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF TEXAS  
MARSHALL DIVISION**

HEADWATER RESEARCH LLC,

Plaintiff,

v.

SAMSUNG ELECTRONICS CO., LTD. and  
SAMSUNG ELECTRONICS AMERICA,  
INC.,

Defendants.

Case No. 2:24-cv-00228-JRG-RSP

JURY TRIAL DEMANDED

**UNOPPOSED MOTION TO EXTEND DEADLINES**

Plaintiff Headwater Research LLC (“Plaintiff”) respectfully submit this Motion to Extend Deadlines.

Pursuant to the First Amended Docket Control Order entered on May 12, 2025, the Court set deadlines for the Claim Construction Briefing as shown in the chart below. Plaintiff respectfully requests that the Court enter an order granting a modest extension of the respective deadlines to file the Claim Construction Briefing.

The parties have met and conferred and Defendants are not opposed to the schedule as outlined below:

<b>Event</b>	<b>Original Deadline</b>	<b>Proposed New Deadline</b>
Plaintiff’s Opening Claim Construction Brief	June 20, 2025	June 23, 2025
Defendant’s Responsive Claim Construction Brief	July 7, 2025	July 10, 2025
Plaintiff’s Reply Brief	July 11, 2025	July 14, 2025
Joint Claim Construction Brief	July 18, 2025	July 18, 2025

Good Cause exists to modify the deadlines addressed in this Motion because of pre-trial, hearing and expert reports in other cases. Additionally, Defendants agree that an extension of the above-listed deadlines will not prejudice any party. Finally, the requested extension is not sought for the purpose of delay and will not require extension of any other deadlines.

Dated: June 20, 2025

Respectfully submitted,

/s/ Marc A. Fenster

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*Headwater Research LLC*

**CERTIFICATE OF SERVICE**

I hereby certify that all counsel of record who are deemed to have consented to electronic service are being served this 20th day of June 2025, with a copy of this document via the Court's CM/ECF system per Local Rule CV-5(a)(3).

/s/ Marc A. Fenster

Marc A. Fenster

**CERTIFICATE OF CONFERENCE OF COUNSEL**

I hereby certify that counsel of record for Headwater and Defendants have met and conferred in compliance with Local CV-7(h). Defendants do not oppose this motion.

/s/ Marc A. Fenster

Marc A. Fenster